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Application granted in part. The deadline to complete all discovery (fact and expert) is extended to April 15, 2023. The case management conference scheduled for February 7, 2023 is adjourned to May 25, 2023 at 2:30 p.m. to be held by telephone using the same dial-in instructions previously provided.

SO ORDERED



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
February 6, 2023

Via ECF

Hon. Philip M. Halpern, U.S.D.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

**Re: Krista Reynolds, et al. v. Target Corporation**  
**SDNY Case No.: 7:22-cv-00072 (PMH)**  
**Our File No.: TARN-190**

Dear Judge Halpern,

This office represents defendant, Target Corporation (“Target”), in the above-referenced matter. There is a case management conference scheduled before Your Honor on February 7, 2023 at 11:30 a.m., in person. However, for reasons below, the parties jointly, and respectfully request that the conference either be adjourned to allow for completion of discovery as detailed below, or, if held, accept this as the parties application in advance to extent/reset various discovery deadlines.

The parties have been attempting to complete the depositions, particularly those of the plaintiffs. The plaintiff, Krista Reynolds deposition was started, but not completed, in November. The expectation was that the deposition would be completed before the end of the year. Indeed, the expectation was that depositions of plaintiff Craig Reynolds and Target would be completed by year-end.

However, extensive difficulties arose in trying to schedule those depositions. However, I learned the difficulties relate to Mr. Craig Reynolds who is and has for the last few months been seriously ill. This has prevented both Mrs. and Mr. Reynolds from appearing for their depositions. From speaking to plaintiff’s counsel, the parties may have to work around said illness, if at all possible. However, due to the above, parties jointly request the court issue an order extending the deadline for completion of fact discovery to April 15, 2023. As it stands, the parties have agreed

upon a date for the completion of Krista Reynolds deposition for February 24, 2023. To date, it has not been possible to schedule the deposition of Craig Reynolds, due to his condition.

Further, the parties jointly request Your Honor reset the expert discovery end date to June 30, 2023. Target anticipates deposing plaintiff's medical expert. Indeed, we ask that Your Honor set a deadline for the service of expert-in-chief reports for May 1, 2023, and rebuttal reports for June 1, 2023.

This is the third request for an extension of discovery end dates.

If Your Honor is so inclined to grant the foregoing, this office will prepare an amended case scheduling order. We will leave it to Your Honor whether you wish to reschedule the February 7, 2023 case management conference. Alternatively, if the case management conference will proceed on February 7, 2023, the defendants will renew the foregoing request for an extension at that time.

We thank Your Honor for your consideration.

Respectfully submitted,

*/s/Mitchell B. Levine*

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MBL:baz  
Enclosure

cc: Kate Carballo, Esq. (via ECF)